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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LOUIS JAMES STOKES,

Defendant.

CASE NO. 2:24-cr-00031-JAM

**FOURTH STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE AND
EXCLUDE TIME**

DATE: May 13, 2025
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 6, 2025, with time excluded under the Speedy Trial Act, per Local Code T4, up to and including that date. ECF No. 29.
2. On April 24, 2025, the Court vacated the May 6 status conference and re-set it for May 13, 2025. ECF No. 39.
3. By this stipulation, defendant now moves to continue the status conference until **July 01, 2025, at 09:00 a.m.**, and to exclude time between May 6, 2025, and July 01, 2025, under Local Code T4.
4. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case that it

1 has produced thus far includes over 200 pages of investigative reports, DEA laboratory reports,
2 and photographs. Discovery also includes physical evidence including a pill press, chemicals
3 used to manufacture pills, and other related equipment. This discovery has been either produced
4 directly to counsel or, for the physical evidence, will be made available for defense inspection.

5 b) Additionally, defense counsel has made requests for additional discovery across a
6 range of categories, including investigative reports, video footage, and mobile telephone data.
7 The government has produced several reports in response to these requests, which defense
8 counsel is reviewing. The government has also made available to the defense the defendant's
9 mobile phone data for review at the investigating agency's office. In addition, the government is
10 in the process of producing additional photographs from the search. The government continues to
11 work to identify and produce additional discovery that the defense has requested and anticipates
12 completing this work before the July 1 status conference.

13 c) Counsel for defendant desires additional time review the discovery that has been
14 produced, inspect the physical evidence, and to review the discovery he anticipates receiving
15 from the government in the near future. In addition, defense counsel needs additional time to
16 consult with his client, to review the current charges, to conduct further investigation, and to
17 discuss potential resolutions. Defense counsel will also need more time to determine whether this
18 case will proceed to trial, to prepare pretrial motions in that event, and to otherwise prepare for
19 trial.

20 d) Counsel for defendant believes that failure to grant the above-requested
21 continuance would deny him/her the reasonable time necessary for effective preparation, taking
22 into account the exercise of due diligence.

23 e) The government does not object to the continuance.

24 f) Based on the above-stated findings, the ends of justice served by continuing the
25 case as requested outweigh the interest of the public and the defendant in a trial within the
26 original date prescribed by the Speedy Trial Act.

27 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
28 et seq., within which trial must commence, the time period of May 13, 2025 to July 01, 2025,

1 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
2 because it results from a continuance granted by the Court at defendant's request on the basis of
3 the Court's finding that the ends of justice served by taking such action outweigh the best interest
4 of the public and the defendant in a speedy trial.

5 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the
6 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
7 must commence.

8 IT IS SO STIPULATED.

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10 Dated: May 6, 2025

MICHELE BECKWITH
Acting United States Attorney

11
12 /s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney

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15 Dated: May 6, 2025

/s/ MICHAEL D. LONG
MICHAEL D. LONG
Counsel for Defendant
LOUIS JAMES STOKES

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18
19 **ORDER**

20 IT IS SO ORDERED.

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22 Dated: May 07, 2025

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE